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From: Zabaneh, Mahfouz
Sent: Wed 2/26/2014 6:10:31 PM
Subject: RE: Heritage Class 2 and Temporary Authorization
Exide 2013-08-21 Approval of Temp Auth Reqt SMSRP.pdf
2013-09-30 Public Notice of TA Decision.pdf

Hi Anthony,

Thank you for this additional information. This was helpful.

I was able to find a Temporary Authorization that California (DTSC) issued to Exide Technologies facility in Sep 2013.

Please see the attached pdf files.

Let me know if you need anything else.

Best regards,

Mike Zabaneh, P.E.

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From: Anthony C. Leverock [mailto:Leverock.Anthony@azdeq.gov]
Sent: Tuesday, February 25, 2014 3:16 PM
To: Zabaneh, Mahfouz
Subject: FW: Heritage Class 2 and Temporary Authorization

Mike - Here is more information concerning the temporary authorization I mentioned in my previous email:

On February 19, ADEQ met with Craig Hogarth, Environmental Manager for Heritage Environmental Services, to discuss a tentative Class 2 Permit Modification and Temporary Authorization (TA) request that they are preparing. Summary of the meeting is as follows:

Class 2 Mod

- 1) Class 2 Mod will be submitted "within the next 2-3 weeks;
- 2) Modifications consist of conversion of the Bulk Loading Area (BLA), currently used for railcar and tanker loading and waste consolidation, to a storage area with a capacity of 22,555 gallons -- this volume corresponds to a capacity of a standard rail car;
- 3) Reduction in the storage capacity of the East Container Storage Area by 1600 gallons from 6600 gallons to 5000 gallons, so that the permitted capacity for the Coolidge facility does not increase by more than 25%;
- 4) Installation of an in-line neutralization process which will involve treatment of alkaline D002 waste with a dilute acid -- the neutralized mixture will be subsequently piped to the rail car for off-site transportation and disposal;
- 5) Increase in the secondary containment capacity to 28,000 gallons to collect spills and stormwater run-on -- Heritage is already making these changes in the design as they rebuild the BLA -- the Permit requires Heritage to submit the as-built drawings upon completion;
- 6) Initially, the objective is to process corrosives, but at a later date wastes stored at Bulk Loading area will include organic wastes destined for consolidation. The in-line neutralization process would be used to transfer the organics between tankers and railcars;
- 7) Heritage would make no changes to the fire protection systems as a result of these modifications.

Temporary Authorization

- 1) The TA will be submitted immediately (one day or so) after submitting the Class 2 Permit Modification request, above.
- 2) Upon completion of construction of the secondary containment mods identified in item 5), above, Heritage will want to proceed with the neutralization/treatment of caustic wastes and render them non-hazardous – the endpoint will be about a pH of 10. They want to use the in-line neutralization process to do this. We view this as treatment in containers, and their existing permit does not allow them to perform such treatment at this location.
- 3) According to Arizona License Timeframe rules the TA request is to be treated as a separate license, but does not have a fee. The LTF has timeframes of 84/84 days Admin/Substantive review. The permit modification rules at 270.42(e) do not provide timeframes, instead stating that the Director “shall approve or deny the TA as quickly as practical”.



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